

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**PLAINTIFF'S UNOPPOSED
MOTION AND [PROPOSED]
ORDER TO FILE DOCUMENTS
UNDER SEAL**

**NOTE ON MOTION CALENDAR:
NOVEMBER 26, 2013**

Pursuant to Local Civil Rule LCR(5)(g), Plaintiffs Eagle Harbor Holdings, LLC, and MediusTech, LLC ("Medius") respectfully submit this Unopposed Motion and [Proposed] Order to File Exhibits 13 and 16 to the Declaration of Jordan Connors in Support of Plaintiff's Eagle Harbor Holdings, LLC's and MediusTech, LLC's Expedited Joint Discovery Motion Pursuant to LCR 37 Regarding Ford's Document Production under seal.

The limited material sought sealed is:

Exhibit 13: Email chain between Ford and Medius employees discussing proprietary technology;

1 Exhibit 16: Deposition transcript of Ford employee Jeffrey Rupp, which includes
2 discussion of proprietary technology.

3 These documents are submitted in support of the parties' Joint LCR 37 Discovery
4 Submission Regarding Ford's Document Production. Ford designated those documents
5 confidential. The parties have stipulated that the sensitive material contained in documents
6 so designated also merits filing under seal.
7

8 Open discovery is favored in this district, and there is a presumption of access to
9 publically-filed documents. LCR 5(g). The confidential and sensitive nature of the material
10 discussed in these documents, however, is good cause to keep them under seal. *See*
11 *Myhrvold v. Lodsys Grp., LLC*, C13-1173 RAJ, 2013 WL 5488791, at *4 (W.D. Wash. Sept.
12 27, 2013) (party must show good cause to keep documents under seal). Medius respectfully
13 request that Exhibits 13 and 16 be sealed.
14

15 Dated: November 26, 2013
16

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and I caused the foregoing to be served upon the following by email:

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/s/ Mandi Bruns